

SHAWN HALBERT  
California SBN 179023  
Law Offices of Shawn Halbert  
214 Duboce Avenue  
San Francisco, California 94103  
Telephone: (415) 703-0993  
Facsimile: (415) 255-8631  
shawn@shawnhalbertlaw.com

Attorney for Defendant  
JONATHAN FLORES

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 19-0584 RS
	)	
Plaintiff,	)	STIPULATION AND ORDER CONTINUING
	)	CASE FROM DECEMBER 1, 2020 TO
v.	)	JANUARY 12, 2021, AND EXCLUDING TIME
	)	FROM DECEMBER 1, 2020 TO JANUARY 12,
JONATHAN FLORES,	)	2021 UNDER THE SPEEDY TRIAL ACT
	)	
Defendant.	)	

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**STIPULATION**

The parties jointly request that the case be continued to January 12, 2021. By way of relevant background, defendant Jonathan Flores does not contest that he engaged in conduct underlying the charges but is raising an affirmative defense. The parties believe that the additional time is necessary in order for defense counsel to complete discussions with the U.S. Attorney's Office and, if the case cannot be resolved, for the parties to resolve any issues relating to additional discovery that will be produced if the case proceeds to trial.

The parties submit that the time between December 1, 2020 and January 12, 2021 should be excluded based on effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties stipulate that the ends of justice served by the continuance outweigh the best interests of the public and the

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defendant in a speedy trial.

IT IS SO STIPULATED.

DATED: November 30, 2020

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SHAWN HALBERT  
Counsel for Jonathan Flores

DATED: November 30, 2020

DAVID L. ANDERSON  
United States Attorney

/s/  
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CHRISTINA LIU  
Assistant United States Attorney

**ORDER**

For the reasons stated herein, IT IS HEREBY ORDERED that the status date of December 1, 2020 shall be continued to January 12, 2021 and that a time exclusion between December 1, 2020 and January 12, 2021 is warranted, and the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective preparation of counsel and would result in a miscarriage of justice, and the continuance is appropriate given the status of the case. 18 U.S.C. § 3161(h)(7)(B)(ii) and (iv).

IT IS SO ORDERED.

DATED: November 30, 2020



HONORABLE RICHARD SEEBORG  
United States District Judge